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Attorneys for Plaintiffs
TEXTRON INNOVATIONS INC. and
BELL HELICOPTER TEXTRON INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TEXTRON INNOVATIONS INC., a
Delaware corporation; BELL HELICOPTER
TEXTRON INC., a Delaware corporation

Plaintiffs,

v.

HELICOPTER WORLD INC., dba
CENTURY HELICOPTER PRODUCTS, and
DOES 1-10, inclusive,

Defendants.

Case No. C 06-06474 MJJ

**STIPULATION AND
[REDACTED] ORDER RE
PRELIMINARY INJUNCTION**

WHEREAS, plaintiffs Textron Innovations Inc. ("TII") and Bell Helicopter Textron Inc. ("Bell Helicopter") have filed an action in the above-entitled Court for *inter alia* for trademark and trade dress infringement, breach of contract, unjust enrichment, and an accounting against defendant Helicopter World Inc. dba Century Helicopter Products ("Helicopter World"); and

1 WHEREAS, TII and Bell Helicopter own the federal registered trademarks for the marks,
2 BELL, JETRANGER, LONGRANGER, COBRA, HUEY, 222 and 47 (the "Trademarks");

3 WHEREAS, TII and Bell Helicopter own the trade dress in the non-functional unique
4 design of the Bell Jetranger, Bell Longranger, Bell 222 and Bell 47, Cobra and Huey helicopters
5 (the "Trade Dress"); and

6 WHEREAS, the Court issued a temporary restraining order against Helicopter World on
7 October 18, 2006; and

8 WHEREAS, the Court set for hearing for an order to show cause re Preliminary Injunction
9 for October 27, 2006; and

10 WHEREAS, the parties to the above-entitled action have mutually agreed to the terms of a
11 Preliminary Injunction without a bond or other security.

12 NOW THEREFORE, it is hereby STIPULATED AND AGREED that Helicopter World,
13 together with their officers, directors, agents, affiliates, servants, employees and attorneys, and
14 those in active concert or participation with each of them, shall be and are hereby RESTRAINED
15 AND ENJOINED, pending final judgment or settlement of this action, from:

16 1. manufacturing, producing, importing, distributing, advertising, selling, offering for
17 sale, moving, or otherwise disposing of, any product bearing any simulation, reproduction,
18 counterfeit, copy, or colorable imitation of any of the Trademarks or Trade Dress;

19 2. using any simulation, reproduction, counterfeit, copy, or colorable imitation of any
20 of the Trademarks or Trade Dress;

21 3. using any false designation of origin or false description that can or is likely to
22 lead the trade, public or individual members thereof to believe that any product manufactured,
23 distributed, or sold by Helicopter World is in any manner associated or connected with TII or Bell
24 Helicopter, or is sold, manufactured, licensed, sponsored or approved or authorized by TII or Bell
25 Helicopter;

26 4. engaging in any other activity constituting an infringement of any of the
27 Trademarks or Trade Dress or otherwise unfairly competing with TII and Bell Helicopter;

28 5. destroying, modifying, disposing of, concealing, or moving product or

merchandise (including those in electronic formats) that bear any of the Trademarks or incorporate any of the Trade Dress or that infringe any of the Trademarks or Trade Dress, and any documents (including those in electronic formats) or other tangible things that discuss, describe, mention or relate to such products or merchandise.

IT IS SO STIPULATED.

Dated: October 26, 2006

ORRICK, HERRINGTON & SUTCLIFFE LLP



KENT B. GOSS
VALERIE M. GOO
CHRISTOPHER J. CHAUDOIR

Attorneys for Plaintiffs
TEXTRON INNOVATIONS, INC. and
BELL HELICOPTER TEXTRON INC.

Dated: October ____, 2006

ERIC F. HARTMAN LAW OFFICES

ERIC F. HARTMAN

Attorneys for Defendant
HELICOPTER WORLD dba CENTURY
HELICOPTER PRODUCTS

IT IS SO ORDERED.

Dated: October ____, 2006

United States District Judge

1 merchandise (including those in electronic formats) that bear any of the Trademarks or
2 incorporate any of the Trade Dress or that infringe any of the Trademarks or Trade Dress, and any
3 documents (including those in electronic formats) or other tangible things that discuss, describe,
4 mention or relate to such products or merchandise.

5 **IT IS SO STIPULATED.**

6
7 Dated: October ____, 2006

ORRICK, HERRINGTON & SUTCLIFFE LLP

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11 KENT B. GOSS
VALERIE M. GOO
CHRISTOPHER J. CHAUDOIR

12 Attorneys for Plaintiffs
13 TEXTRON INNOVATIONS, INC. and
14 BELL HELICOPTER TEXTRON INC.

15 Dated: October 26, 2006

ERIC F. HARTMAN LAW OFFICES

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ERIC F. HARTMAN

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20 Attorneys for Defendant
21 HELICOPTER WORLD dba CENTURY
HELICOPTER PRODUCTS

22 **IT IS SO ORDERED.**

23
24 Dated: October 26, 2006

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26 
27 United States District Judge
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